

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

BRIAN HAYWOOD and  
MARQUEES FRENCH

No. 20 CR 546

Judge Virginia M. Kendall

**GOVERNMENT'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
TO RESPOND TO DEFENDANT FRENCH'S MOTIONS**

The UNITED STATES OF AMERICA, through JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, hereby moves for an order to extend the date for the government to respond to motions filed by defendant Marquees French to February 1, 2021 and defendant's reply to the motions on February 8, 2021, and in support thereof states as follows:

1. The indictment in this case charged defendants Brian Haywood and Marquees French with one count of knowingly selling or disposing of a firearm to a felon in violation of Title 18, United States Code, Section 922(d)(1). Doc. # 31.

2. On November 4, 2020, the Court set a motion schedule for the parties. The schedule set stated that defense motions were due on Monday, January 11, 2021, the government's responses were due on Monday, January 25, 2021, and defendants' replies were due on Monday, February 1, 2021. Doc. # 38.

3. On January 11 and 12, 2021, defendant French filed his pretrial motions. To date, defendant Haywood has yet to file motions. Docs. # 40-44.

4. Undersigned counsel for the government reached out to counsel for both defendants and requested their position regarding the government requesting an additional week to file a response to the motions. Counsel for defendant French stated that he did not have an objection. As of this writing, counsel for the government has not gotten a response from counsel for Haywood.

WHEREFORE, the government respectfully requests that this Court enter an order re-setting the date for the government's response to defendant French's motions to February 1, 2021 and defendant's reply to the motions on February 8, 2021.

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

By: /s/ Albert Berry III  
ALBERT BERRY III  
Assistant U.S. Attorneys  
219 South Dearborn St., Rm. 500  
Chicago, Illinois 60604  
(312) 886-7855

Dated: January 25, 2021